Remarks

Claim Rejections – 35 U.S.C § 112

In the Office Action dated June 14, 2005, the Examiner indicates that claims 6

through 10, 24 and 25 stand rejected under 35 U.S.C. § 112, ¶ 2 for failing to particularly point

out and distinctly claim the subject matter which applicant regards as the invention. More

specifically, the Examiner asserts that dependent claims 6 through 10 recite the "step of

broadcasting" without sufficient antecedent basis in independent claim 1 for this limitation.

Additionally, the Examiner asserts that dependent claims 24 and 25 recite the limitation "over

the transmission system" without sufficient antecedent basis for this limitation. By this

Amendment, the Applicant has amended claim 1 to indicate the step of "broadcasting the content

pages," thereby providing sufficient antecedent basis for claims 6 through 10. Additionally, by

this amendment, the Applicant has amended claims 24 and 25. The amendments to the claims

are supported by the application as originally filed and do not introduce new matter.

Accordingly, entry of the amendments to the claims is respectfully submitted.

Claim Rejections – 35 U.S.C. §103

The Examiner rejects claims 1-11 and 13-34 under 35 U.S.C. §103(a) as being

obvious over Qureshi et al. (U.S. Patent No. 6,396,500) in view of Allport (U.S. Patent No.

6,097,441). The Applicant respectfully traverses these rejections, and asserts that the claims

pending in the present application are patentable over the references cited by the Examiner for at

least the reasons stated below.

Qureshi provides a system for translating slides, originally created by presentation

software such as Microsoft's PowerPoint, into HTML documents for display in a browser. Col.

7, lines 52-56. Slides, which may contain text, graphic images, movies, etc., are translated using

a slide HTML page creation module. Col. 10, line 66 – Col. 11, line 7. The HTML pages

generated by the HTML page creation module can then be displayed in a browser program. Col.

11, lines 10-15.

Allport provides a system for viewing data streams on multiple displays, such as

on a TV screen and a display on a remote control unit. Abstract. Allport purportedly alleviates

the clutter on display systems by parsing data streams and displaying portions of the content,

such as text or navigational information, on a remote control, and other parts of the content on a

television display. Col. 6, lines 49-61 and Col. 7, lines 60-65. Allport discusses that removing

text or navigation information from the image displayed on the television provides more room on

the television for displaying a primary image. Col. 6, lines 58-61.

By contrast, independent claim 1 is directed towards methods for organizing

content for presentation to television viewers. The method of independent claim 1, and the

claims dependent thereon, comprise storing a plurality of templates each identifying one or more

locations at which content is available and one or more transformation techniques for

transforming content for distribution to television users. Content is captured from the locations

specified in each template and transformed according to the transformation techniques specified

in the templates. Content is inserted into the templates to create a set of content pages that are

encoded into a video form and broadcast to television viewers. Independent claims 17 and 20

comprise substantially similar elements, cast as a system and computer readable media storing

program code, respectively.

The Examiner asserts that Qureshi discusses storing a plurality of templates each

identifying one or more locations at which content is available and one or more transformation

techniques. The Applicant respectfully disagrees. Qureshi merely generates HTML pages from slides already generated by a presentation program or similar facility. Col. 7, lines 56-62. Qureshi does not discuss, teach or otherwise suggest storing templates, each template identifying one or more locations at which content is available and capturing the content from the one or more locations specified in each template, as claimed in independent claims 1, 17 and 20. Qureshi merely receives a plurality of slides and adds markup tags to the content of the slides so as to generate an HTML page. Col. 12, lines 19-25. Moreover, Qureshi does not describe the use of templates identifying one or more transformation techniques. A user of the system discussed in Qureshi merely indicates the format for saving a plurality of slides, namely HTML. Col. 14, line 66 – Col. 15, line 5.

The HTML page creation module of Qureshi converts the slides generated in a presentation program and saved in a slide show presentation file, to HTML files. Col. 15, lines 2-7. The HTML page creation module does not identify locations at which content is available nor is content captured from locations specified in each template. Content is simply received from a slide show presentation file. Col. 14, line 66 – Col.15, line 2. Moreover, the Examiner recognizes that "Qureshi does not teach broadcasting" as claimed. Office Action, p. 3 . Similarly, Allport does not discuss, teach or otherwise suggest storing a plurality of templates each identifying one or more locations at which content is available as claimed in independent claims 1, 17 and 20. Instead, Allport discusses converting digital data streams for display on physically independent but cooperating displays. Col. 3, lines 51-55 and Col. 5, lines 33-36. Therefore, Allport and Qureshi, either alone or in combination, fail to teach the limitations of independent claim 1.

Independent claim 34 is directed towards a method for organizing content for presentation to television viewers. The method of independent claim 34, and the claims dependent thereon, comprise storing a plurality of templates each template identifying one or more locations at which content is available and one or more transformation techniques for transforming content for distribution to television users. Content is captured from the locations specified in each template and transformed according to the transformation techniques specified in the templates. The content is inserted into the templates to create a set of content pages that are encoded into a video form and continuously broadcast to television viewers for a specified duration.

The Examiner recognizes that "Qureshi does not teach broadcasting." Office Action, p. 3. Moreover, Qureshi does not suggest the use of templates, each template identifying one or more locations at which content is available and one or more transformation techniques. Qureshi discusses the use of an HTML page creation module to convert the information from a slide generated using a presentation program into a corresponding HTML page for display in a browser. Col. 10, line 66 – Col. 11, line 3. Qureshi, however, does not discuss the identification of one or more locations at which content is available and one or more transformation techniques for transforming content for distribution to television users, as claimed. A user of the system discussed in Qureshi merely indicates the format for saving a plurality of slides, namely HTML, and the HTML page creation module simply converts the slides generated in a presentation program, and saved in a slide show presentation file, to HTML files. Col. 14, line 66 – Col. 15, line 5 and Col. 15, lines 2-7. The HTML page creation module does not identify locations at which content is available nor is content captured from locations specified in each template. Instead, content is received from a slide show presentation file. Col. 14, line 66 – Col.15, line 2.

Similarly, Allport does not discuss, teach or otherwise suggest storing a plurality of templates each identifying one or more locations at which content is available and identifying transformation techniques as claimed in independent claims 1, 17 and 20.

Allport discusses converting digital data streams for display on physically independent but cooperating displays. Col. 3, lines 51-55 and Col. 5, lines 33-36. Moreover, while Allport discusses encoding content for television display, Allport does not discuss, teach or otherwise suggest encoding content pages that are continuously broadcast to television viewers for a specified duration as claimed. Allport merely discusses receiving and viewing data streams on a plurality of display devices. Abstract. Independent claim 34 teaches encoding content pages into a video form and continuously broadcasting the content to television viewers for a specified duration. Therefore, Allport and Qureshi, either alone or in combination, fail to teach the limitations of independent claim 34.

Independent claim 21 is directed towards a method for creating an Internet album. The method of independent claim 21, and the claims dependent thereon, comprise storing a plurality of templates, each template specifying one or more Internet sites. Templates further contain slots for each Internet site adapted to hold content retrieved from an Internet site, and transformation techniques for transforming content for distribution to television viewers. Content for a given slot within a template is retrieved from the Internet. The transformation technique is applied to the retrieved content and the transformed content is entered into a given slot. For each slot in a template, the abovementioned method is repeated, thereby creating a plurality of album pages containing content. The pages of an album are organized into an Internet album in accordance with a defined ordering scheme and the Internet album is encoded into a video form for broadcasting to television viewers.

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The Examiner asserts that Qureshi discusses storing a plurality of templates each identifying one or more locations at which content is available and one or more transformation techniques. As previously mentioned, Qureshi generates HTML pages from slides already generated by a presentation program or similar facility. Col. 7, lines 56-62. Qureshi receives a plurality of slides that were originally created for a slide show to be presented. Col. 4, lines 45-48. An HTML page creation module adds markup tags to slides saved in a slide show presentation file to generate corresponding HTML pages. Col. 10, line 66 – Col. 11, line 3. Alternatively, independent claim 21 teaches retrieving content from the Internet for a given slot in a template. Each template specifies one or more Internet sites and a slot for each Internet site adapted to hold content retrieved from the Internet site. Moreover, each template specifies a transformation technique for transforming the content retrieved. Qureshi, however, does not discuss, teach or otherwise suggest retrieving content from an Internet site. Instead, Qureshi discusses retrieving slides from a slide presentation file saved from a presentation program. Additionally, Qureshi does not discuss the use of templates, nor does Qureshi discuss the use of templates identifying transformation techniques. Instead, Qureshi discusses the use an HTML page creation module that allows a user to indicate the format for saving a plurality of slides, namely HTML. Col. 14, line 66 – Col. 15, line 5. The HTML page creation module simply converts the slides generated in a presentation program, and saved in a slide show presentation file, to HTML files. Col. 15, lines 2-7.

Similarly, Allport fails to discuss, teach or otherwise suggest retrieving content from the Internet for a given slot in a template. While Allport makes reference to "data transmitted from the internet," Col. 1, lines 19-23, the reference is made for the purpose of providing an example of a possible input data stream that can be viewed simultaneously with

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cooperating displays. Col. 1, lines 19-23 and Col. 3, lines 49-53. However, Allport does not discuss the use of templates specifying one or more Internet sites and slots to hold transformed content retrieved from an Internet site. Allport merely discusses receiving and viewing data streams on a plurality of display devices. Abstract. Therefore, Allport and Qureshi, either alone or in combination, fail to teach the limitations of independent claim 21.

Independent claim 22 is directed towards a system for organizing content available from a plurality of locations for presentation to a viewer. The system of independent claim 22, and the claims dependent thereon, comprise a set of templates used to generate a set of corresponding content pages. Each template identifies locations at which content is available and transformation techniques for transforming content for distribution to television viewers to thereby generate a content page. An album data structure stores the set of templates according to a predefined sequence and delivers the content pages to a viewer according to the predefined sequence upon request. An encoder encodes the content pages into a video form for broadcasting to television viewers.

The Examiner asserts that Qureshi discusses storing a plurality of templates each identifying one or more locations at which content is available and one or more transformation techniques. As previously noted, Qureshi merely generates HTML pages from slides created using a presentation program or similar facility. Col. 7, lines 56-62. Qureshi does not discuss or otherwise suggest the use of a set of templates, each template identifying one or more locations at which content is available, as claimed in independent claim 22. Moreover, Qureshi does not discuss the use of templates identifying one or more transformation techniques for transforming content. Qureshi merely receives a plurality of slides and adds markup tags to the content of the slides so as to generate an HTML page. Col. 12, lines 19-25. Similarly, while Allport discusses

broadcasting, Allport does not suggest or otherwise teach the use of templates, each identifying one or more locations at which content is available and one or more transformation techniques. Therefore, Allport and Qureshi, either alone or in combination, fail to teach the limitations of independent claim 22.

Independent claim 29 is directed towards a system for organizing content available from a plurality of locations for presentation to a viewer. Independent claim 29, and the claims dependent thereon, comprise a set of templates stored in memory used to generate a set of corresponding content pages. Each template identifies one or more computerized locations at which content is available and one or more transformation techniques for transforming content. A capture engine captures content from the one or more locations specified in the templates.

The Examiner asserts that Qureshi teaches storing a plurality of templates that identify locations at which content is available and one or more transformation techniques. The Applicant respectfully disagrees. Qureshi merely generates an HTML document that corresponds to each slide in a slide presentation file created by a presentation program. Col. 3, lines 57-60. Qureshi does not discuss, teach or otherwise suggest the use of templates stored in memory to identify computerized locations at which content is available. Furthermore, Qureshi does not discuss or otherwise suggest a capture engine for capturing content from locations specified in a set of templates. The system discussed in Qureshi merely receives as input slides generated in a presentation program and generates corresponding HTML page. However, Qureshi does not discuss the use of a capture engine for capturing content from locations specified in a template. Moreover, Qureshi does not discuss the use of templates identifying one or more transformation techniques for transforming content. Qureshi simply allows a user to

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indicate that slides generated in a presentation program are to be saved as HTML files. Col. 15, lines 2-7. The slides annotated with HTML tags are generated using an HTML page creation module and not templates identifying one or more transformation techniques. Col. 10, line 66 – Col. 11, line 7.

Additionally, Allport does not discuss, teach or otherwise suggest storing templates in memory, each template identifying one or more computerized locations at which content is available and one or more transformation techniques. Therefore, Allport and Qureshi, either alone or in combination, fail to teach the limitations of independent claim 29.

Therefore, despite the Examiner's assertion that that it would have been obvious to one of ordinary skill in the art at the time of the invention to combine Allport with Qureshi, both of these references, either alone or in combination, fail to teach the limitations of independent claims 1, 17, 20, 21, 22, 29 or 34.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the art of record. Given the Applicant's position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

<u>Claim Rejections – 35 U.S.C. §102</u>

The Examiner further rejects claims 1, 17, 20-22 and 29 under 35 U.S.C. 102(e) as being anticipated by Norris (U.S. Patent No. 6,147,768). The Applicant respectfully traverses the rejections and asserts that the claims pending in the present application are patentable over the references cited by the Examiner for at least the reasons stated below.

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Norris discusses a system for assembling a photographic album using negative photographic images and displaying an album on a video monitor. Abstract and Col. 3, lines 45-48. Images are entered into a database of photographs. Col. 3, lines 35-38. A mat database stores a plurality of mats available for mounting and framing photographs. Col. 4, lines 59-66. The system discussed in Norris enables a user to view photographs in the mats selected from the mat database on a video monitor. Col. 7, lines 19-21. The combination of photographs and mats selected can either be printed or transferred to videotape and later viewed on a video display. Col. 5, lines 53-56 and Col. 7, lines 28-32.

Independent claim 1, 17 and 20 are directed towards methods, systems and a computer media storing program code, respectively, for organizing content for presentation to television viewers. Independent claims 1, 17 and 20, and the claims dependent thereon, comprise storing templates, each template identifying one or more locations at which content is available and one or more transformation techniques for transforming content for distribution to television users. Content is captured from the locations specified in each template, and thereafter transformed according to the transformation techniques specified in the templates. The content is inserted into the templates to create a set of content pages that are subsequently encoded into a video form and broadcast to television viewers.

The Examiner asserts that Norris discusses storing a plurality of templates, or pages, that identify locations of content and transformation techniques. The Applicant respectfully disagrees with the Examiner's assertion. The Examiner attempts to equate templates of the present invention with mats stored in a database as discussed in Norris. Mats, as discussed in Norris, merely provide a visual representation of the arrangement of photographs within an album mat that a user may order from a manufacturer. Col. 5, lines 9-15. Mats, however, do not

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identify one or more locations at which content is available. A user of the system discussed in Norris must select the content, comprising photographs, to be included in a particular mat. Col. 8, lines 5-7. A user of the system discussed in Norris may either enter the identification number of a given photograph or select the photograph from a sequence of displayed photographs to be included within a given mat. Col. 8, lines 7-10. However, mats, as discussed in Norris, do not capture content from one or more locations. Instead, a user of the system discussed in Norris selects the photographs for inclusion within a given mat. Moreover, mats do not identify one or more transformation techniques for transforming content. Mats merely indicate a predetermined configuration for a page of a photographic album. Col. 4, line 66 – Col. 5, line 8. In order to configure an image for a given mat, a user must use different shaped masks placed over negative images to create shapes resembling the available mat choices. Col. 5, lines 46- 50. Moreover, the sizing of an image for a given album mat is performed by the photographic database and not identified by the mat. Col. 6, line 65 – Col. 7, line 2. Accordingly, mats neither identify locations of content nor identify transformation techniques for transforming content.

Independent claim 21 is directed towards a method for creating an Internet album. The method of independent claim 21 and the claims dependent thereon comprise storing a plurality of templates specifying one or more Internet sites, slots for each Internet site adapted to hold content retrieved from an Internet site, and a transformation technique for transforming content for distribution to television viewers. Content for a given slot within a template is retrieved from the Internet. The transformation technique is applied to the content retrieved, and the transformed content is entered into the given slot. Content for the additional slots of the template are retrieved, transformed, and entered into each of the template's slots. The plurality

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of templates are organized into an Internet album and encoded into a video form for broadcasting to television viewers.

Norris discusses a system whereby images are entered into a system using photographic negative images. Col. 5, lines 47-50. As discussed in Norris, normal photographic means are used to expose film and capture images. Col. 3, lines 37-40. Exposed film is processed and negatives are made and manually edited, and thereafter captured by a video camera that directs the captured image to processing hardware. Col. 3, lines 40-45. However, Norris does not discuss, teach or otherwise suggest the use of templates specifying one or more Internet sites with slots to hold content retrieved from an Internet site. Instead, content is collected using video capturing systems and the photographs collected are stored in a photograph database. Col. 4, lines 56-58. Thereafter, a user of the system discussed in Norris may select images stored in the photograph database. Col. 8, lines 5-10. Norris, however, does not describe a system whereby content may be retrieved from Internet sites. Mats, as discussed in Norris, merely provide a visual representation of the arrangement of photographs within an album mat that a user may order from a manufacturer. Col. 5, lines 9-15. A user of the system discussed in Norris must select the photographs stored in a photograph database to be displayed within a selected mat. Col. 7, lines 20-22 and Col. 8, lines 5-10. However, unlike the present invention, mats do not specify Internet sites where content may be retrieved. Moreover, mats do not identify one or more transformation techniques for transforming content. Mats merely indicate a predetermined configuration for a page of a photographic album. Col. 4, line 66 – Col. 5, line 8.

Independent claim 22 is directed towards a system for organizing content available from a plurality of locations for presentation to a viewer. The system of independent claim 22 comprises a set of templates used to generate a set of corresponding content pages.

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Each template identifies locations at which content is available and transformation techniques for transforming content for distribution to television viewers. The system of claim 22 further comprises an album data structure operative to store the set of templates according to a predefined sequence and deliver one or more content pages to a viewer according to the predefined sequence upon request. The content is delivered to television viewers through the use of an encoder operative to encode the content pages into video form.

In contrast to the present invention, Norris does not discuss the use of templates to generate a set of corresponding content pages, each template identifying locations where content is available or transformation techniques for transforming the content. Mats, as described in Norris, represent a particular configuration available for a page in a photographic album. Col. 2, lines 47-48. Mats do not specify the location of content and instead merely provide a visual arrangement or configuration for a series of photographs Col. 2, lines 4-5. Norris does not discuss, teach or otherwise suggest the use of templates specifying one or more locations where content may be retrieved. Instead, Norris discusses a system where content, comprising photographs, is collected using a video capturing system. Photographs collected by the video capturing system are stored in a photograph database. Col. 6, line 53-55. Thereafter, a user of the system discussed in Norris may select images stored in the photograph database to be included in a given mat. Col. 8, lines 5-10. Norris, however, does not describe a system whereby content may be retrieved from locations specified in templates. Mats, as discussed in Norris, merely provide a visual representation of the arrangement of photographs within an album mat that a user may order from a manufacturer. Col. 5, lines 9-15. A user of the system discussed in Norris must select the photographs stored in a photograph database to be displayed within a selected mat. Col. 7, lines 20-22 and Col. 8, lines 5-10. Moreover, mats do not identify

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transformation techniques for transforming content, as claimed. Images must be altered using different shaped masks placed over negative images or resized by a photographic database storing photographs. Col. 5, lines 46-50 and Col. 6, line 66 – Col. 7, line 2. Therefore, mats do not identify locations where content is available or transformation techniques for transforming content.

Independent claim 29 is directed towards a system for organizing content available from a plurality of locations for presentation to a viewer. Independent claim 29 comprises a set of templates stored in memory used to generate a set of corresponding content pages. Each template identifies one or more computerized locations at which content is available and one or more transformation techniques for transforming content. A capture engine captures content from the one or more locations specified in the templates. A display engine is operative to transform the captured content from each of the locations specified in the set of templates in accordance with the transformation techniques specified in the templates. An album data structure is operative to store the set of templates according to a predefined sequence and deliver the content pages to a viewer according to the predefined sequence. The album data structure is further operative to specify a display time for each content page. An encoder is operative to encode the content pages into a video form for broadcasting to television viewers.

In contrast to the present invention, Norris merely receives photographic images using a video capturing system and stores the captured images in a photograph database. Col 3, lines 35-45 and Col. 6, lines 53-55. The photographs stored in the photograph database may be selected by a user of the system discussed in Norris for inclusion in a selected mat. Col. 4, lines 58-66. Templates, as claimed in the present invention, identify locations at which content is available. A user of the system discussed in Norris, however, must select the one or more
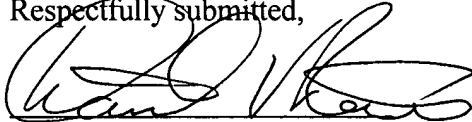
photographs to include in a given mat. Col. 8, lines 5-10. Therefore, a mat does not identify

locations at which content is available, as claimed. Additionally, a mat does not identify one or

more transformation techniques for transforming content. The photographic images displayed in

a given mat are resized by a photograph database or altered using shaped masks placed over a

negative image. Mats, however, do not define one or more transformation techniques for

transforming content. Col. 5, lines 46-50 and Col. 6, line 66 – Col. 7, line 2. Moreover, Norris

does not suggest the use of a capture engine for capturing content from locations specified in a

set of templates. Capturing content, as discussed in Norris, is accomplished through the use of a

video camera and photographic images. Col. 3, lines 46-50. Moreover, Norris does not discuss,

teach or otherwise suggest an album data structure operative to specify a display time for each

content page. Norris merely discusses an album function that may be used to prepare a slide

show of the pages comprising an album with the selected mats and photographs. Col. 8, lines

60-63. While the slide show function discussed in Norris provides for the sequential viewing of

album pages, Norris does not describe a system whereby a display time may be specified for

each content page.

The dependent claims of the present application contain additional features that

further substantially distinguish the invention of the present application over the art of record.

Given the Applicant's position on the patentability of the independent claims, however, it is not

deemed necessary at this point to delineate such distinctions.

For the above reasons, the Applicant submits that the present invention, as

claimed, is patentable over the references cited by the Examiner. Accordingly, reconsideration

and allowance of pending claims 1-34 is therefore respectfully solicited. To expedite

prosecution, the Examiner is invited to contact the Applicant's representative at 212-895-2905.
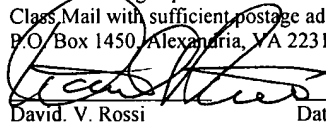
Respectfully submitted,

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